

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	NO. 4:17-cr-00737
	§	
KAAN SERCAN DAMLARKAYA	§	

**UNOPPOSED JOINT MOTION TO CONTINUE HEARING**  
**ON MOTION TO WITHDRAW AS ATTORNEY**

TO THE HONORABLE ANDREW HANEN, UNITED STATES DISTRICT  
JUDGE FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION:

COMES NOW Attorney's Jack B. Carroll and Philip Stephenson, Attorney's for the  
Defendant in the above styled and numbered cause. Attorneys file this Joint Motion for  
Continuance and in support thereof would show the Court as follows:

I.

Attorney's filed independent motions to withdraw as attorneys of record on July 20,  
2018. This matter was set for a hearing by the court to be heard on July 30, 2018.

II.

Attorneys are set to pick a jury for a preferentially set murder trial in the Trinity County,  
Texas at 8:00 AM on July 30, 2018. This is the 3<sup>rd</sup> trial setting for this case, and due to the size  
of the county, the age of the case, and the difficulty in obtaining a jury panel, would request this  
matter to be pushed until Attorneys have returned from trial.

III.

Attorneys anticipate this trial to last no longer than 8 business days, and would be

available for this hearing August 9<sup>th</sup>, 10<sup>th</sup>, or the week thereafter.

Due to the above mentioned conflicts, Attorneys requests that the hearing be continued.

This motion is not made for purposes of delay, but so that justice may be done.

**WHEREFORE, PREMISES CONSIDERED**, the Attorneys prays that his motion for continuance be granted.

Respectfully submitted,

/s/ JACK B. CARROLL

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KAAN SERCAN DAMLARKAYA

**CERTIFICATE OF CONFERENCE**

On July 25, 2018, co-counsel for Defendant, Philip Stephenson, conferred with AUSA Alamdar Hamdani concerning his position on this motion. Mr. Hamdani stated that he is unopposed to both Mr. Stephenson and Mr. Carroll making a motion to continue this hearing.

/s/ Philip Stephenson

Philip Stephenson

**CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties registered for CM/ECF.

/s/ Philip Stephenson

Philip Stephenson

/s/ JACK B. CARROLL

JACK B. CARROLL